

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
-vs-)	No. CR-24-125-JD
)	
OLUKAYODE ADURAGBENRO OJO,)	
)	
Defendant.)	

JOINT STATEMENT OF DISCOVERY CONFERENCE

This joint statement is submitted pursuant to LCrR16.1(b).

1. Date Conference Held: April 10, 2024, within fourteen (14) days of the appearance before Magistrate Judge Green where a plea of not guilty was entered.

2. Names of the attorneys who attended the conference:
U.S. Attorney/AUSA: Jackson D. Eldridge
Defense Attorney: Ronald Jones II
☒ Retained ☐ Federal Public Defender/Assistant FPD or ☐ CJA Panel Member

Counsel conferred telephonically for purposes of exchanging discovery materials in accordance with the Federal Rules of Criminal Procedure as supplemented by the Local Criminal Court Rules and any orders of this Court and, as a result of the conference, the undersigned counsel report the following:

3. The specific time, date, and place at which the offense(s) charged is/are alleged to have been committed:

As alleged in the Indictment.

4. (a)(1) Any contested issues of discovery and inspection raised by counsel for plaintiff:

Unknown at this time. The United States requests all notices and discovery to which it is entitled under the Federal Rules of Criminal Procedure, the Local Rules, or any other federal law or rule, and has provided discovery on the understanding that counsel for defendant will provide such discovery and notices on a timely basis.

(2) Any contested issues of discovery and inspection raised by counsel for defendant:

Unknown at this time. Counsel for the government has provided investigative materials (bearing bates numbers OJO_000001 through OJO_000347) to counsel for defendant. The United States is in the process of obtaining additional certified court records from Kentucky state Court (Boone County Circuit Court), which will be provided to Defendant when received.

Defendant requests all notices and discovery to which he is entitled under the Federal Rules of Criminal Procedure, the Local Rules, or any other federal law or rule. Defendant requests that such notices and/or discovery be timely provided.

(b) Any additional discovery or inspection desired by either party:

None at this time.

5. The fact of disclosure of all materials favorable to the defendant or the absence thereof within the meaning of *Brady v. Maryland* and related cases:

Counsel for plaintiff expressly acknowledges continuing responsibility to disclose any material favorable to defendant within the meaning of *Brady* that becomes known to the government during the course of these proceedings.

6. The fact of disclosure of the existence or nonexistence of any evidence obtained through electronic surveillance or wiretap:

None.

7. The fact of disclosure of the contemplated use of the testimony of an informer. (Include only the fact an informer exists and not the name or testimony thereof):

None.

8. The fact of disclosure of the general nature of any evidence of other crimes, wrongs, or acts the government intends to introduce at trial pursuant to Fed. R. Evid. 404(b):

The United States will provide reasonable notice before trial of the general nature of any evidence of other crimes, wrongs, or acts the government intends to introduce at trial, as required by Fed. R. Evid. 404(b), the Federal Rules of Criminal Procedure, the Local Rules, or any other federal law, rule, or order

9. The fact of disclosure of the prior felony convictions of any witness the government intends to call in its case-in-chief:

The United States will provide criminal histories, if any, for each witness it intends to call at trial.

10. The resolution, if any, of foundational objections to documentary evidence to be used by both parties (except for the purpose of impeachment):

Unknown at this time.

11. The resolution, if any, of chain-of-custody matters (where at issue):

None at this time.

12. The resolution, if any, of the admissibility of any reports containing scientific analysis without requiring the expert's attendance at trial:

None at this time.

13. The parties will provide each other with the opportunity to inspect any demonstrative evidence, representational exhibits, or charts.

Counsel for both parties' state that there are no additional matters of discovery presently known.

Counsel expressly acknowledges the obligation to produce these items(s) as soon as practicable, but in no event later than fourteen (14) days prior to the trial of this cause. Counsel also expressly acknowledges continuing obligation to disclose any materials that become known to counsel during the course of the pretrial investigation of this cause.

14. Notice of Alibi:

None.

15. Notice of Insanity Defense or Expert Testimony of Defendant's Mental Condition:

None.

16. Notice of Defense Based on Public Authority:

None.

At the conclusion of this conference, counsel conferred concerning the contents of this joint statement.

Respectfully submitted,

ROBERT J. TROESTER
United States Attorney

s/ Jackson Eldridge

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s/ Ronald Jones II

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